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FILED
U.S. DISTRICT COURT

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DISTRICT OF UTAH

BY:

DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF UTAH, CENTRAL DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SAID AHMED HIRSI,

Defendant.

INDICTMENT

VIOS: 18 U.S.C. § 1951(a), Hobbs Act
Robbery (Counts 1, 3, 5, 7);
18 U.S.C. § 924(c)(1)(A), Using,
Carrying, Brandishing and Discharging
a Firearm During and in Relation to a
Crime of Violence (Counts 2, 4, 6, 8);

Case: 2:17-cr-00080
Assigned To : Waddoups, Clark
Assign. Date : 2/1/2017
Description: USA v.

The Grand Jury charges:

COUNT 1
(Hobbs Act Robbery)

On or about December 22, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, did take from an employee, against the employee's will, at the Anayas

Market located at 660 North 1200 West, Salt Lake City, Utah, by physical force and violence, threatened force and violence and fear of injury, United States currency, which belonged to and was in the care, custody, control, management and possession of the Anayas Market, and by committing such robbery, obstructed, delayed and affected commerce and the movement of articles or commodities in interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 1951(a) and 2.

COUNT 2

(Using, Carrying and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 22, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, during and in relation to the crime of violence alleged in Count 1 of this Indictment, did knowingly use, carry, and brandish a firearm; all in violation of 18 U.S.C. § 924(c)(1)(A).

COUNT 3

(Hobbs Act Robbery)

On or about December 27, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, did take from an employee, against the employee's will, at the Taco Bell restaurant located at 1758 West North Temple, Salt Lake City, Utah, by physical force and violence, threatened force and violence and fear of injury, United States currency, which

belonged to and was in the care, custody, control, management and possession of Taco Bell, and by committing such robbery obstructed, delayed and affected commerce and the movement of articles or commodities in interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 1951(a) and 2.

COUNT 4

(Using, Carrying and Brandishing a Firearm During and in Relation to a Crime of Violence)

On or about December 27, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, during and in relation to the crime of violence alleged in Count 3 of this Indictment, did knowingly use, carry, and brandish a firearm, and did aid and abet therein; all in violation of 18 U.S.C. §§ 924(c)(1)(A) and 2.

COUNT 5

(Hobbs Act Robbery)

On or about December 29, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, did take from an employee, against the employee's will, at Smokin' Als located at 915 North 900 West, Salt Lake City, Utah, by physical force and violence, threatened force and violence and fear of injury, merchandise and United States currency, which belonged to and was in the care, custody, control, management and possession of Smokin' Als, and by committing such robbery obstructed, delayed and affected commerce

and the movement of articles or commodities in interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 1951(a) and 2.

COUNT 6

(Using, Carrying, Brandishing and Discharging a Firearm During and in Relation to a Crime of Violence)

On or about September 10, 2016, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, during and in relation to the crime of violence alleged in Count 5 of this Indictment, did knowingly use, carry, and brandish a firearm, and did aid and abet therein; all in violation of 18 U.S.C. §§ 924(c)(1)(A) and 2.

COUNT 7

(Hobbs Act Robbery)

On or about January 6, 2017, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, did attempt to take from an employee, against the employee's will, at the Golden Pearl Restaurant located at 1625 West 700 North, Salt Lake City, Utah, by physical force and violence, threatened force and violence and fear of injury, United States currency, which belonged to and was in the care, custody, control, management and possession of the Golden Pearl Restaurant, and by committing such robbery obstructed, delayed and affected commerce and the movement of articles or commodities in interstate commerce, and did aid and abet therein; all in violation of 18 U.S.C. §§ 1951(a) and 2.

COUNT 8

(Using, Carrying, Brandishing and Discharging a Firearm During and in Relation to a Crime of Violence)

On or about January 6, 2017, in the Central Division of the District of Utah,

SAID HIRSI,

defendant herein, during and in relation to the crime of violence alleged in Count 7 of this

Indictment, did knowingly use, carry, brandish and discharge a firearm, and did aid and abet

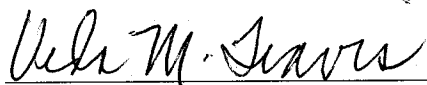
therein; all in violation of 18 U.S.C. §§ 924(c)(1)(A) and 2.

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

JOHN W. HUBER
United States Attorney



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Assistant United States Attorney